



CULLENandDYKMAN LLP

CYNTHIA BOYER OKRENT

PARTNER

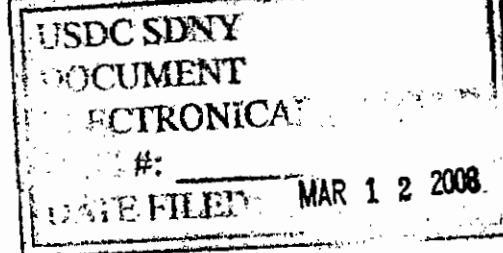
DIRECT LINE: 212-510-2253

DIRECT FAX: 212-742-8260

E-MAIL: COKRENT@CULLENANDDYKMAN.COM

44 Wall Street
New York, New York 10005-2407
Telephone (212) 732-2000 • Facsimile (212) 571-2838

March 11, 2008



Via Facsimile

Hon. Laura Taylor Swain
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 755
New York, New York 10007

MEMO ENDORSED

Re: **AMS Group LLC v. JPMorgan Chase
S.D.N.Y., Index No. 07 CIV 6988 (LTS)**

Dear Judge Swain:

We represent defendant JPMorgan Chase Bank, N.A. ("Chase") in the above-referenced matter and write to request that the pre-trial conference, currently scheduled for March 14, 2008, at 10:00 a.m., be adjourned to May 2, 2008, at 10:00 a.m., or another date convenient to the Court. In addition, we request that Chase's time to answer or move with respect to the Amended Complaint be extended to April 2, 2008. Plaintiffs' counsel consents to both the adjournment and the extension.

The adjournment of the pre-trial conference is requested because counsel needs additional time to prepare the joint pre-trial statement. In addition, Chase intends to renew its motion to dismiss plaintiffs' amended complaint on the grounds, *inter alia*, that the claims are time barred. Prior to serving the motion, we shall try to resolve the issues with plaintiffs' new counsel.

Thank you for your time and attention to this matter.

Sincerely,

Cynthia Boyer Okrent (CO-9233)

cc: Law Office of Robert H. Parker, P.C.
246 Fifth Avenue, Suite 600
New York, New York 10001

The requested extension of time to respond to the complaint is granted. The pre-trial conference is adjourned to May 2, 2008, at 10:15 AM.
SO ORDERED.

3/12/2008
LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE
WASHINGTON, D.C.
NEW JERSEY